



SEACC

November 5, 2010

Forrest Cole
Tongass National Forest Supervisor
Tongass National Forest
648 Mission Street
Ketchikan, AK 99901

Re: Draft 2010-2014 Integrated Vegetation Plan

Dear Forest Supervisor Cole:

Please accept our comments on the draft 2010-2014 Integrated Vegetation Plan for the Tongass National Forest. The Southeast Alaska Conservation Council (SEACC) appreciates your willingness to engage the public at this early, but critical stage. Such an approach will help the agency fully implement its stated commitment, which we strongly endorse, to end large-scale old-growth logging on the Tongass quickly. We are ready to work with you to make sure that the draft schedule accomplishes this objective and urge you to implement this transformation through a revision to the Tongass Plan.

SEACC is a coalition of 15 citizen organizations based in 13 Southeast Alaskan communities. SEACC's membership includes commercial fishermen, Alaska Natives, value-added wood product manufacturers, tourism and recreation business owners, and Alaskans from many walks of life. SEACC is dedicated to preserving the integrity of Southeast Alaska's unsurpassed environment while encouraging sustainable use of our resources.

We are excited with the ongoing discussions on how to develop diverse economic opportunities that support ecological and community health – such as forest restoration, renewable energy, commercial fisheries, subsistence, and recreation. We are pleased with the progress of our cooperative efforts with the Forest Service to modify the controversial Central Kupreanof timber sale into a forest management project that focuses on maximizing the creation of sustainable stewardship jobs in the economically distressed community of Kake instead of how much old-growth timber is offered for sale. The Staney Creek community forest project is another example of a promising collaborative effort. We appreciate the leadership, time and effort invested by the Forest Service into this process, and we intend to remain fully engaged and committed to achieving the goals of this multi-stakeholder process. We also plan to actively engage in the Asset Mapping and Strategic Planning process announced by the Forest Service at the Tongass Futures Roundtable in September. We have hired a respected economist with a wide range of experience in Southeast Alaska, Gregg Erickson, to support our interactions with the Forest Service and Juneau Economic Development Council on this important analysis.

We welcome the fact that the sales identified on the draft schedule stay out of Inventoried Roadless Areas and appear to limit potential conflicts with other lands of high fish, wildlife, and

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community values. We also appreciate the Forest Service's effort to integrate stewardship and restoration projects, such as wildlife habitat restoration, riparian thinning, red-pipe remediation, and road storage, into its management schedule.

This said the timber sales in the draft schedule are essentially the same old growth timber sales that were already in the planning hopper before the ground-breaking announcement that the Forest Service intended to quickly eliminate large scale old-growth logging on the Tongass. The volume of timber proposed under the schedule far exceeds what the current industry uses. Further, to facilitate this logging, the schedule proposes 208 miles of new road construction. The agency needs to reduce the amount of old-growth logging and new road construction in this schedule.

Because of the intensity of past logging of the biggest and most valuable forest on the Tongass, we understand the difficulty the agency has of finding any area available for logging today that does not raise some concerns over the environment or impacts to surrounding communities/users of the forest. This is true for several of the planned sale areas, particularly the Big Thorne, Tonka, Kuiu, Navy and Wrangell Island sales. We feel the best way to provide the timber industry with a predictable supply of timber for local mills in an environmentally and community acceptable way is to continue with collaborative planning processes. For timber sales scheduled in the first 2 years of this plan, we suggest collaboration on site specific layout of the sales could reduce conflicts. Sales in the 3-5 year time frame should be developed and planned by initiating collaborative meetings, such as those done for the Staney project.

We understand the Forest Service's desire to offer timber to local mills in a timely fashion. We feel that the collaborative process can be done in a way that meets this objective. For example, we understand the Forest Service hopes to issue a stewardship contract via the Central Kupreanof Timber Sale by the spring on 2011. Because the Forest Service intends to develop a stewardship program with this sale to meet the long-term environmental and economic needs of the community of Kake, we are helping to hire a Kake community member to convene a collaborative group to facilitate this effort.

We urge the Forest Service to expand the scope of projects on its proposed schedule that would result in an increase in the number of projects related to recreation, renewable energy, and restoration and increase funding available for these projects. For example, the second growth thinning proposed focuses overwhelmingly on pre-commercial thinning rather than wildlife treatments or riparian thinning. We encourage the Forest Service to work with the Forest Science Laboratory, Pacific Northwest Research Station, and University of Alaska to design a vigorous program for designing and evaluating the effectiveness of proposed treatments.

We remain uncertain how renewable energy development fits into the Forest Service's framework, and nothing in the draft schedule indicates how the agency intends to proceed with this integral part of the framework. The proposed schedule places a considerable focus on logging jobs, yet this industry makes up a very small portion of Southeast Alaska's economy. Energy, on the other hand, is critical issue for the economy of many communities in the Tongass. We would like to see the Forest Service shift agency personnel from planning large scale timber

sales to planning environmentally responsible and appropriately scaled renewable energy development to help get local communities off of diesel power. An example of this is shifting staff away from planning old-growth timber sales to helping plan the Kake-Petersburg intertie project and helping Angoon move forward with the Thayer Lake Hydro Project.

Finally, we believe the best way to achieve the Forest Service's ambitious goal, provide for sustainable economic opportunities in the region, and protect the unique quality of life we enjoy in Southeast Alaska is for the agency to commence a revision of the Tongass plan promptly. The law requires the Forest Service to revise a forest plan at least every 15 years or when conditions change significantly. While the Forest Service amended the Tongass Plan twice since 1997, now is the time to begin the required revision process. Starting the public process for this effort now can provide the collaborative framework necessary for developing understandings, building trust, and ensuring the long-term sustainability of all the uses, values, products, and services the Tongass provides all of us.

Thanks you for considering out comments, and we would like to meet with you to discuss these options further.

Best Regards,



Lindsey Ketchel
Executive Director

Cc: Harris Sherman, Under Secretary, USDA
Tom Tidwell, Chief
Beth Pendleton, Regional Forester